

June 5, 2014

Liesa Cianchino
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RE: Artificial Water Fluoridation

Dear Members of Regional Council:

I am writing to you on behalf of the Concerned Residents of Peel, a group that is dedicated to ending the artificial fluoridation of Peel's drinking water. We respectfully request that this letter be added to the June 12, 2014 Agenda.

Since April 28, 2011, the Concerned Residents of Peel have made delegations to Regional Council and have articulated urgent concerns related to the safety and the lawfulness of the chemical additives used to fluoridate our drinking water.

For decades now, all levels of Government, Public Health Officials, Dental Associations and many other organizations have unconditionally re-assured Regional Council Members and residents that community water fluoridation is both safe and effective.

Over the past few years we continued to highlight our serious concerns related to artificial water fluoridation with respect to the many adverse health effects and risks; the mass medication of the entire Region; the lack of informed consent; and the potential illegality of the Region's fluoridation program, including the *Clean Water Act 2006*, which empowers communities to take action to prevent threats from becoming significant.

During these past few years a growing body of new scientific research has been published in leading peer-reviewed scientific and medical journals, which corroborate our position on these issues.

In this submission we draw your attention to some major legal challenges that need to be addressed before this Council can legally continue the current fluoridation program. The public has the right to know and the right to get the answers.

- Health Canada has, instead of attending a round table discussion with members of Regional Council, concerned residents and experts chose to answer written questions on Behalf of The Concerned Residents of Peel, Dr. Hardy Limeback and a Member of Council, supplied answers that were, after analysis, including legal analysis, false and or misleading.
- The Hydrofluorosilicic Acid used as its fluoridating chemicals by Peel Region is recognized legally as being a toxic and a hazardous product by the Hazardous Products Act 2010, listed in its First Priority Substances List as part of the 40 most toxic substances and defined as such in at least 8 other Federal and Provincial laws or regulations.
- The Hydrofluorosilicic Acid used as its fluoridating chemicals by Peel Region has NOT been legally approved as a substance to prevent dental decay, that is, by legal definition, a drug or a natural health product, by Health Canada or by the US FDA.
- The Hydrofluorosilicic Acid used as its fluoridating chemicals by Peel Region contravenes the Food and Drug Act when added to water which is unfit for human consumption by its toxic nature, its unhygienic as manufactured, packaged, transported and stored in uncontrolled sanitary conditions required by the «Good

Manufacturing Practices» (GMP).

- Health Canada, the Ministry of Health, the Public Health Agency and many Municipal Councils are misrepresented by health authorities with a «bait and switch» practice that has attributed, to the fluoridation chemicals, functions that their nature and their legal classifications does NOT legally permit.
- The Hydrofluorosilicic Acid used as its fluoridating chemicals by Peel Region is NOT of Pharmaceutical or Food Grade, they are Industrial Grade as labelled «For Industrial Use Only». «Shall NOT be used as food».
- The Hydrofluorosilicic Acid used as its fluoridating chemicals by Peel Region is NOT abiding the *United States Pharmacopeia* (USP) standard or its equivalent for its identification, strength, quality and purity and are NOT manufactured in the required and strict conditions of the «Good Manufacturing Practices» (GMP).
- The Hydrofluorosilicic Acid used as its fluoridating chemicals by Peel Region is produced in facilities that are NOT subjected to «Good Manufacturing Practices» (GMP).
- The Hydrofluorosilicic Acid used as its fluoridating chemicals by Peel Region according to Health Canada's own statement does NOT fall under its jurisdiction, which excludes Hydrofluorosilicic Acid of being legally a drug, a natural health product, a mineral for food fortification, a food additive or plainly a food, excluding by definition any therapeutic or nutritional function of preventing dental decay.
- The Hydrofluorosilicic Acid used as its fluoridating chemicals by Peel Region, despite the fact that its real nature and its legal classification render it improper for the purpose aimed and claimed by its addition to drinking water, as it is added solely for a therapeutic purpose of preventing and reducing dental decay by modifying the composition and the function of a tissue in human beings, that is by legal definition a purpose and an allegation that can only be attributed to a drug or a natural health product.
- The Hydrofluorosilicic Acid used as its fluoridating chemicals by Peel Region can NOT be legally a water treatment chemical because it does NOT treat the water as water treatment chemicals, thus, it can NOT be legally used for preventive therapeutic purpose without contravening the Food and Drug Act.
- Health Canada claims that fluoridating agents are nothing more than water treatment chemicals and that medical, dental, dental hygienist and pharmaceutical professional boards have absolutely NO legal qualification to take a stand on fluoridation as water treatment chemicals are NOT a part of their training, scope of practice or curriculum, thereby, these professionals can NOT be called experts on fluoridation or take a stand on it.
- Fluoridation water treatment chemicals, if used in a municipality, must legally comply with the NSF Standard 60 and be certified as such, which requires Toxicological Studies that would demonstrate safety.
- Health Canada, the Ministry of Health, the Public Health Agencies, the EPA, and the CDC were NOT able to supply the required Toxicological Studies that would demonstrate the safety of the fluoridating water treatment chemicals.

The addition of water treatment chemicals, that do NOT meet the legal NSF Standard 60 requisite of a review of Toxicology Studies proving its safety, even if a false certificate has been delivered for these substances, it will NOT legally discharge any member of Peel Regional Council of their liability.

Adding a product for the primary purpose to treat preventively a disease called dental decay with water treatment chemicals:

- that do NOT meet legal certification requirements,
- that safety has NOT been proven by Toxicological Studies,
- that is unregulated, uncontrolled and untested by Health Canada for its therapeutic or nutritional uses,
- that are legally defined as hazardous chemicals, that are unhygienic by its unsanitary conditions of manufacturing, packaging, transporting and storing,
- that are produced in facilities that are NOT subjected to «Good Manufacturing Practices»,
- that are administered to all residents (patients) without informed consent, thereby, given the above facts, would seriously subject members of this Council to liability and even to potential criminal charges.

Council has been alerted numerous times on the new legislation in Ontario's *Safe Drinking Water Act, 2002, Section 19*, now includes a broader statutory standard of care for individuals who have oversight responsibilities for municipal drinking water systems that extend to our municipal Councillors.

We respectfully ask that you **re-open the Fluoridation issue and afford our Lawyer, and some key experts if required an opportunity to make a presentation on the key findings and arguments in order that you are fully informed of the implications to Council Members, staff and the Corporation of Peel.**

For the record, we have asked numerous times for the Toxicology Studies to verify the safety of the Hydrofluorosilic Acid used to fluoridate the Region of Peel's drinking water and to date, none have been provided.

We trust that you now have a greater appreciation and understanding as to the reasons why we need to take immediate action to stop artificial water fluoridation because it is unsafe, upoven, unethical, unnatural and unnecessary.

In closing, on behalf of **your** Concerned Residents of Peel, **we urge you, our elected Members of Council, to take immediate action and direct staff to stop adding the toxic chemical additive in question, Hydrofluorosilicic Acid, to Peel's water supply until this Council and the Concerned Residents of Peel receive the Toxicological Studies to prove safety for human consumption.**

Respectively Submitted By:

Liesa Cianchino

On Behalf of the Concerned Residents of Peel

Founding Member of the World Wide Alliance to End Fluoridation

Special Thanks to:

Dr. Gilles Parent ND

Co-author of "Fluoridation: Autopsy of a Scientific Error"